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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)
)

To: The Commission

PAXSON SUPPLEMENT TO PETITION FOR RECONSIDERATION

Paxson Communications Corporation, through its licensee subsidiaries ("PCC"), by its attorneys, and pursuant to the Commission's Order,^{1/} hereby supplements its June 13, 1997 Petition for Reconsideration ("Petition") of the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), insofar as requesting adjustments to the DTV Table of Allotments. In the Petition, PCC stated its belief that, by allowing interested parties a brief additional comment period to provide a more thorough analysis, the Commission could more efficiently and expeditiously fix discrete problems in the DTV Table of Allotments than by reviewing a plethora of separate rulemaking petitions and notification applications after the DTV Table became final. PCC appreciates this opportunity offered by the Commission, and, accordingly, PCC is providing herewith supplemental information regarding certain stations and their respective DTV allotments.

^{1/} Advanced Television Systems, *Order*, MM Docket No. 87-268, DA 97-1377 (rel. July 2, 1997).

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List A B C D E

I. OUT-OF-CORE DTV ALLOTMENTS

Stations WAQF-TV (Batavia, NY),^{2/} KAJW-TV (Tolleson, AZ)^{3/} and WAKC-TV (Akron, OH) have been assigned DTV channels that are presently outside of the Commission's "core spectrum." Consequently, PCC anticipates that it will be forced to relocate its digital operations for these stations at the end of the DTV transition period and to incur the costs associated with such a move. Two stations, WAQF-TV and KAJW-TV, have current NTSC operations on Channel 51, and, because the core spectrum may eventually be located between channels 2-46, face the possibility that neither of their existing allotments will be in the Commission's core spectrum.

Because the Commission did not put into effect regulations that would mitigate the costs of these single and double moves, PCC has examined the possibility for immediately relocating to an available allotment in the core spectrum. Unfortunately, PCC was unable to identify any such vacant allotments that would satisfy the Commission's criteria of "no new interference."^{4/} Consequently, PCC urges the Commission to make efforts to alleviate the costs incurred by the few stations facing these circumstances or modify the Commission's criteria concerning such relocation. The disparity in treatment of similarly situated

^{2/} PCC is the assignee of this station (Fant Broadcasting Companies is the licensee and assignor). Because the assignment application has been granted, and because assignor did not submit a petition for reconsideration of the *DTV Orders*, PCC asserts standing to raise concerns regarding this station.

^{3/} PCC holds a 49% interest in America 51, L.P., the permittee of this station. Because of this substantial interest, and because America 51, L.P. did not submit a petition for reconsideration of the *DTV Orders*, PCC asserts standing to raise concerns regarding this station.

^{4/} See *Sixth R&O* at ¶222.

broadcasters, where some broadcasters must pay to relocate their digital operations but others enjoy allotments in the core spectrum, runs afoul of *Melody Music*^{5/} and its progeny.

II. KTFH-TV — Conroe, TX

In the *Sixth R&O*, the Commission proposed to allocate Channel 5 (presently slated to be outside of the Commission's "core spectrum,") as KTFH-TV's paired DTV channel with an ERP at the very minimum 1 kW. KTFH-TV broadcasts on NTSC Channel 49, PCC is understandably concerned that, while the 1 kW ERP is predicted to fully replicate KTFH-TV's service area, in practice, transmissions at such low powers will be unable to propagate through structures of any moderate size. Accordingly, PCC requests that the Commission reassign KTFH-TV's DTV channel or, in the alternative, authorize increased ERP and antenna height for KTFH-TV.

As shown in the attached Engineering Statement ("Exhibit E"), Channels 25 and 16 are feasible substitutes for KTFH-TV's paired allotment. The percent match for replication of the KTFH-TV NTSC operation on Channel 49 on either DTV Channel 25 or DTV Channel 16 is identical to the DTV Channel 5 allotment. Neither of the proposed alternate DTV channels would have an effect on the percent match for NTSC replication with respect to all affected DTV allotments or cause additional interference to NTSC operations. In fact, operation on either of the alternate channels rather than DTV Channel 5 would reduce predicted interference to NTSC operation on Channel 5 at San Antonio, Texas. As between the alternate channels, DTV Channel 25 is the preferred choice due to the possibility of

^{5/} *Melody Music, Inc. v. FCC*, 345 F.2d 730 (D.C. Cir. 1965).

interference with land mobile operations in the lower UHF channels. For these reasons, and as shown in the attached Engineering Statement, PCC requests that the Commission reassign KTFH-TV Channel 25 as its DTV allotment. In the event Channel 25 proves to be unavailable, Channel 16 should be reassigned as the DTV allotment for KTFH-TV.

In the alternative, PCC requests that the Commission allow for increased power and antenna height for the station. Not only will this change help mitigate the inequitable circumstances of KTFH-TV's allotment, but it will act to remedy the egregious power disparity existing between certain UHF stations. As the Commission is well aware, many DTV stations with UHF allotments, including KTFH-TV, have been allotted power levels at a mere fraction of the power levels of other DTV stations. The practical effect of this power disparity, as fully described in the Petition,^{6/} is that many viewers will be unable to receive the lower power stations with their set-top antennas, though they will easily obtain reception of the higher power DTV stations. This disparity of power has to be considered in the context of the Commission's replication policy, the purpose of which was to assure that viewers who currently watch a particular station would receive its digital broadcasts. Unfortunately, the DTV Table undercuts that aspiration. Replication's purpose can still be achieved, however, without the construction of thirty-foot antennas for every home. The Commission can authorize increases in antenna power and height in meritorious instances such as with KTFH-TV. As a result, KTFH-TV would be relieved of a serious competitive disadvantage and viewers watching new DTV technology would enjoy *all of their stations* — without constructing pole antennas.

^{6/} See Petition at 3-12.

For the reasons stated in the foregoing, and as demonstrated in the attached Engineering Statement, PCC requests that the Commission act on these requests.

Respectfully submitted,

PAXSON COMMUNICATIONS CORPORATION

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Dated: August 22, 1997

**EXHIBIT E
ENGINEERING STATEMENT
SUPPLYING SUPPLEMENTAL INFORMATION
IN SUPPORT OF A PETITION FOR RECONSIDERATION
OF THE SIXTH REPORT AND ORDER IN DOCKET 87-268
BY PAXSON COMMUNICATIONS CORPORATION**

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Prepared by
Lohnes and Culver Washington, D.C.
August, 1997

**EXHIBIT E
ENGINEERING STATEMENT
SUPPLYING SUPPLEMENTAL INFORMATION
IN SUPPORT OF A PETITION FOR RECONSIDERATION
OF THE SIXTH REPORT AND ORDER IN DOCKET 87-268
BY PAXSON COMMUNICATIONS CORPORATION**

INTRODUCTION

This statement was prepared on behalf of Paxson Communications Corporation, through its licensee subsidiaries ("PCC") relative to the above referenced FCC Docket and in support of its June 13, 1997 Petition for Reconsideration in the matter. PCC is the FCC licensee of station KTFH-TV Channel 49 at Conroe, Texas. This statement provides information regarding the anticipated propagation and future operation of KTFH on the FCC DTV allocated Channel 5 and suggested reallocation channels.

KTFH-TV PROPOSED REALLOCATION

KTFH-TV has been assigned television Channel 5 for use as a DTV channel. In the previous June 13 petition, PCC stated its concerns regarding the potential poor performance of Channel 5 with limited ERP and its position outside of the core of DTV channels. At that time FCC OET Bulletin No. 69 was not yet available, making a substitute channel allotment suggestion impossible.

Because technical information relating to PCC's petition is now available in OET Bulletin No. 69, adopted July 2, 1997 by Commission Order (DA No. 97-1377), this statement supplies supplemental information pertaining to PCC's request for reconsideration of the DTV allotments for KTFH-TV. Specifically, it supports a reallocation to DTV operation on Channel 25 or 16.

TECHNICAL ANALYSIS

The software program needed to verify the PCC proposal to change the DTV channel assignments of KTFH-TV is now available through the release of OET Bulletin No. 69. The office of the undersigned has the complete software package as described in OET Bulletin No. 69 available for use on a computer work station similar to the computers used by OET in the development of the DTV allotment plan. The results of individual market analysis have been compared with service replication and interference evaluations contained in Table 1 of Appendix B of the Sixth Report and Order with total agreement and verification of the accuracy of the program.

Analysis for KTFH-TV

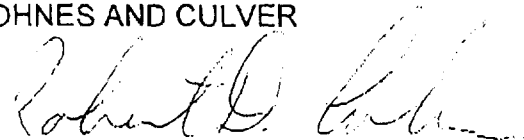
On behalf of PCC, the Office of Lohnes and Culver has conducted an analysis using the software developed by OET to demonstrate that, as an alternative to the FCC DTV Channel 5 allotment, DTV Channel 25 or 16 can be paired with NTSC Channel 49 at Conroe, TX. Attached to this statement as Figure 1 is a computer printout showing an analysis of the allotment of DTV Channel 5 proposed by the Commission in the Sixth Report, as compared with an analysis of the alternative DTV channel allotments proposed by PCC. The analysis indicates that the percent match for replication of the licensed NTSC Channel 49 operation of KTFH-TV for the proposed allotment of DTV Channel 5 is identical with either of the alternative DTV Channel allotments.

A study of other NTSC operations and proposed DTV allotments was conducted to determine the impact on those operations/allotments as a result of the proposed change in the Conroe, TX allotment. The result of that analysis is tabulated on Figure 2. The analysis indicates that the proposed DTV Channel 25 or 16 allotment will have no effect on the percent match for ATV/NTSC replication with respect to all affected DTV allotments and will not cause additional interference to NTSC operations. The predicted interference to the NTSC operation on Channel 5 at San Antonio, TX will be reduced by the proposed KTFH-TV change away from DTV Channel 5 at Conroe, TX.

CONCLUSION

The analysis for KTFH-TV described above, based on the use of the Commission's computer software, demonstrates that there are no DTV allotments or NTSC operations that would be adversely affected by changing the DTV channel allotment for KTFH-TV to DTV Channel 25 or 16. PCC's proposal to pair an alternative DTV Channel with KTFH-TV is justifiable since the FCC allotment on DTV Channel 5 is not within the tentative DTV core of channels specified in the Sixth Report and Order. PCC requests that Channel 25 be considered its primary reallocation channel to minimize the conflict with land mobile communication in the lower UHF channels. PCC further requests that the Commission reconsider its treatment of the paired DTV allotment for KTFH-TV by evaluating service replication based on a non-directional antenna pattern since that will maximize service area and the impact on other U.S. DTV allotments and NTSC operations may be minimal.

Respectfully submitted,
LOHNES AND CULVER



By, Robert D. Culver, P.E.
Maryland Reg.No. 19672

August, 1997

FIGURE 1A
COMPARISON OF DTV PAIRINGS
KTFH-TV WITH FCC DTV CH. 5
KTFH-TV WITH SUBSTITUTE DTV CH. 16

SIXTH REPORT AND ORDER

num atv: 3342
 num ntsc: 3342
 cell: 4.0186
 Analysis of: 49N TX CONROE

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	1069348	2033.4
lost to additional IX by ATV	59	12.1
lost to all IX	1069407	2045.5

Analysis of: 5A TX CONROE

HAAT 359.0 m, ATV ERP 1.0 kW, direction 190.0 degrees T, F/B = 13.9 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

PROPOSED SUBSTITUTION

num atv: 3342
 num ntsc: 3342
 cell: 4.0186
 Analysis of: 49N TX CONROE

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	1069348	2033.4
lost to additional IX by ATV	59	12.1
lost to all IX	1069407	2045.5

Analysis of: 16A TX CONROE

HAAT 359.0 m, ATV ERP 70.2 kW, direction 190.0 degrees T, F/B = 18.8 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	2767	4.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	2767	4.0
percent match ATV/NTSC	100.0	100.0

Prepared by
 Lohnes and Culver Washington, D.C.
 August, 1997

**FIGURE 1B
COMPARISON OF DTV PAIRINGS
KTFH-TV WITH FCC DTV CH. 5
KTFH-TV WITH SUBSTITUTE DTV CH. 25**

SIXTH REPORT AND ORDER

num atv: 3342
num ntsc: 3342
cell: 4.0186
Analysis of: 49N TX CONROE

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	1069348	2033.4
lost to additional IX by ATV	59	12.1
lost to all IX	1069407	2045.5

Analysis of: 5A TX CONROE

HAAT 359.0 m, ATV ERP 1.0 kW, direction 190.0 degrees T, F/B = 13.9 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

PROPOSED SUBSTITUTION

num atv: 3342
num ntsc: 3342
cell: 4.0186
Analysis of: 49N TX CONROE

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	1069348	2033.4
lost to additional IX by ATV	59	12.1
lost to all IX	1069407	2045.5

Analysis of: 25A TX CONROE

HAAT 359.0 m, ATV ERP 86.7 kW, direction 190.0 degrees T, F/B = 18.8 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	3	4.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	3	4.0
lost to all IX	3	4.0
percent match ATV/NTSC	100.0	100.0

Lohnes and Culver Washington, D.C.
August, 1997

FIGURE 2A
ANALYSIS OF NTSC/ATV STATIONS
AFFECTED BY CHANNEL 16 DTV PAIRING FOR KTFH-TV

KTFH PAIRED WITH CH. 5 (SIXTH R&O)

KTFH PAIRED WITH CH. 16 (PROP.)

num atv: 10684
 num ntsc: 10690
 cell: 4.0351
 analysis of: SN LA ALEXANDRIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44483.0
not affected by terrain losses	998277	43704.3
lost to NTSC IX	16508	569.0
lost to additional IX by ATV	0	0.0
lost to all IX	16508	569.0

analysis of: 35A LA ALEXANDRIA
 HAAT 485.0 m, ATV ERP 1000.0 kW, Cap Adj 2.2 dB 90.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44483.0
not affected by terrain losses	1000586	44103.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	655	169.5
lost to ATV IX only	655	169.5
lost to all IX	655	169.5
percent match ATV/NTSC	100.0	99.9

num atv: 10684
 num ntsc: 10690
 cell: 4.0351
 analysis of: SN LA ALEXANDRIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44483.0
not affected by terrain losses	998277	43704.3
lost to NTSC IX	16508	569.0
lost to additional IX by ATV	0	0.0
lost to all IX	16508	569.0

analysis of: 35A LA ALEXANDRIA
 HAAT 485.0 m, ATV ERP 1000.0 kW, Cap Adj 2.2 dB 90.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44483.0
not affected by terrain losses	1000586	44103.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	655	169.5
lost to ATV IX only	655	169.5
lost to all IX	655	169.5
percent match ATV/NTSC	100.0	99.9

num atv: 7063
 num ntsc: 7063
 cell: 4.0190
 analysis of: 6N TX BEAUMONT

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	703695	33100.3
lost to NTSC IX	63684	4714.3
lost to additional IX by ATV	0	0.0
lost to all IX	63684	4714.3

analysis of: 21A TX BEAUMONT
 HAAT 293.0 m, ATV ERP 1000.0 kW, Cap Adj 1.6 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	704249	33184.7
lost to NTSC IX	121	64.3
lost to additional IX by ATV	0	0.0
lost to ATV IX only	7	8.0
lost to all IX	121	64.3
percent match ATV/NTSC	100.0	100.0

num atv: 7063
 num ntsc: 7063
 cell: 4.0190
 analysis of: 6N TX BEAUMONT

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	703695	33100.3
lost to NTSC IX	63684	4714.3
lost to additional IX by ATV	0	0.0
lost to all IX	63684	4714.3

analysis of: 21A TX BEAUMONT
 HAAT 293.0 m, ATV ERP 1000.0 kW, Cap Adj 1.6 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	704249	33184.7
lost to NTSC IX	121	64.3
lost to additional IX by ATV	0	0.0
lost to ATV IX only	7	8.0
lost to all IX	121	64.3
percent match ATV/NTSC	100.0	100.0

Prepared by
 Lohnes and Culver Washington, D.C.
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FIGURE 2A (CONTINUED)

num atv: 9856	num atv: 9856	num atv: 8976	num atv: 8976
num ntsc: 9856	num ntsc: 9856	num ntsc: 9027	num ntsc: 9027
cell: 4.0189	cell: 4.0189	cell: 4.0004	cell: 4.0004
Analysis of: 5N TX FORT WORTH	Analysis of: 5N TX FORT WORTH	Analysis of: 5N TX SAN ANTONIO	Analysis of: 5N TX SAN ANTONIO
within Noise Limited Contour	POPULATION 4418651 AREA (sq km) 46297.3	within Noise Limited Contour	POPULATION 1663667 AREA (sq km) 40635.9
not affected by terrain losses	4400524 45059.5	not affected by terrain losses	1638940 39003.8
lost to NTSC IX	173366 5449.6	lost to NTSC IX	51375 2892.3
lost to additional IX by ATV	0 0.0	lost to additional IX by ATV	0 0.0
lost to all IX	173366 5449.6	lost to all IX	51375 2892.3
Analysis of: 41A TX FORT WORTH	Analysis of: 41A TX FORT WORTH	Analysis of: 55A TX SAN ANTONIO	Analysis of: 55A TX SAN ANTONIO
HAAT 514.0 m, ATV ERP 1000.0 kW, Cap Adj 3.0 dB 315.0 degrees	HAAT 514.0 m, ATV ERP 1000.0 kW, Cap Adj 3.0 dB 315.0 degrees	HAAT 424.0 m, ATV ERP 1000.0 kW, Cap Adj 3.3 dB	HAAT 424.0 m, ATV ERP 1000.0 kW, Cap Adj 3.3 dB
within Noise Limited Contour	POPULATION 4418651 AREA (sq km) 46297.3	within Noise Limited Contour	POPULATION 1663667 AREA (sq km) 40635.9
not affected by terrain losses	4411022 45537.8	not affected by terrain losses	1646977 39239.8
lost to NTSC IX	0 0.0	lost to NTSC IX	39595 452.0
lost to additional IX by ATV	0 0.0	lost to additional IX by ATV	13 8.0
lost to ATV IX only	0 0.0	lost to ATV IX only	37917 412.0
lost to all IX	0 0.0	lost to all IX	39608 460.0
percent match ATV/NTSC	100.0 100.0	percent match ATV/NTSC	99.3 99.4
num atv: 1018	num atv: 1018	num atv: 1018	num atv: 1018
num ntsc: 1018	num ntsc: 1018	num ntsc: 1018	num ntsc: 1018
cell: 3.9990	cell: 3.9990	cell: 3.9990	cell: 3.9990
Analysis of: 15N TX COLLEGE STATION	Analysis of: 15N TX COLLEGE STATION	Analysis of: 12A TX COLLEGE STATION	Analysis of: 12A TX COLLEGE STATION
within Noise Limited Contour	POPULATION 137391 AREA (sq km) 4071.0	within Noise Limited Contour	POPULATION 137391 AREA (sq km) 4071.0
not affected by terrain losses	137391 4071.0	not affected by terrain losses	137391 4071.0
lost to NTSC IX	0 0.0	lost to NTSC IX	0 0.0
lost to additional IX by ATV	0 0.0	lost to additional IX by ATV	0 0.0
lost to all IX	0 0.0	lost to all IX	0 0.0
Analysis of: 12A TX COLLEGE STATION	Analysis of: 12A TX COLLEGE STATION	Analysis of: 12A TX COLLEGE STATION	Analysis of: 12A TX COLLEGE STATION
HAAT 119.0 m, ATV ERP 3.2 kW, direction 315.0 degrees	HAAT 119.0 m, ATV ERP 3.2 kW, direction 315.0 degrees	HAAT 119.0 m, ATV ERP 3.2 kW, direction 315.0 degrees	HAAT 119.0 m, ATV ERP 3.2 kW, direction 315.0 degrees
within Noise Limited Contour	POPULATION 137391 AREA (sq km) 4071.0	within Noise Limited Contour	POPULATION 137391 AREA (sq km) 4071.0
not affected by terrain losses	137391 4071.0	not affected by terrain losses	137391 4071.0
lost to NTSC IX	0 0.0	lost to NTSC IX	0 0.0
lost to additional IX by ATV	0 0.0	lost to additional IX by ATV	0 0.0
lost to ATV IX only	0 0.0	lost to ATV IX only	0 0.0
lost to all IX	0 0.0	lost to all IX	0 0.0
percent match ATV/NTSC	100.0 100.0	percent match ATV/NTSC	100.0 100.0

Prepared by
Lohnes and Culver Washington, D.C.
August, 1997

FIGURE 2A (CONTINUED)

num atv: 10750
num ntsc: 10750
cell: 3.9884
Analysis of: 11N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3901485	44614.2
not affected by terrain losses	3898739	44083.7
lost to NTSC IX	19517	1208.5
lost to additional IX by ATV	0	0.0
lost to all IX	19517	1208.5

Analysis of: 31A TX HOUSTON

HAAT 570.0 m, ATV ERP 751.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3901485	44614.2
not affected by terrain losses	3901150	44550.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	28	12.0
lost to ATV IX only	28	12.0
lost to all IX	28	12.0
percent match ATV/NTSC	100.0	100.0

num atv: 10750
num ntsc: 10750
cell: 3.9884
Analysis of: 11N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3901485	44614.2
not affected by terrain losses	3898739	44083.7
lost to NTSC IX	19517	1208.5
lost to additional IX by ATV	0	0.0
lost to all IX	19517	1208.5

Analysis of: 31A TX HOUSTON

HAAT 570.0 m, ATV ERP 751.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3901485	44614.2
not affected by terrain losses	3901150	44550.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	28	12.0
lost to ATV IX only	28	12.0
lost to all IX	28	12.0
percent match ATV/NTSC	100.0	100.0

num atv: 3767
num ntsc: 3767
cell: 4.0046
Analysis of: 16N TX CORPUS CHRISTI

	POPULATION	AREA (sq km)
within Noise Limited Contour	446867	15085.2
not affected by terrain losses	446067	15005.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 22A TX CORPUS CHRISTI

HAAT 296.0 m, ATV ERP 50.0 kW, direction 342.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	446067	15005.2
not affected by terrain losses	446867	15085.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

num atv: 3767
num ntsc: 3767
cell: 4.0046
Analysis of: 16N TX CORPUS CHRISTI

	POPULATION	AREA (sq km)
within Noise Limited Contour	446867	15085.2
not affected by terrain losses	446067	15005.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 22A TX CORPUS CHRISTI

HAAT 296.0 m, ATV ERP 50.0 kW, direction 342.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	446067	15005.2
not affected by terrain losses	446867	15085.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

num atv: 6343
num ntsc: 6343
cell: 4.0389
Analysis of: 14N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3783542	25008.8
not affected by terrain losses	3783542	25004.7
lost to NTSC IX	2114	185.8
lost to additional IX by ATV	533	28.3
lost to all IX	2647	214.1

Analysis of: 31A TX HOUSTON

HAAT 438.0 m, ATV ERP 265.2 kW, direction 30.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	3783542	25008.8
not affected by terrain losses	3783542	25004.7
lost to NTSC IX	1336	20.2
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	1336	20.2
percent match ATV/NTSC	100.0	100.0

num atv: 6343
num ntsc: 6343
cell: 4.0389
Analysis of: 14N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3783542	25008.8
not affected by terrain losses	3783542	25004.7
lost to NTSC IX	2114	185.8
lost to additional IX by ATV	533	28.3
lost to all IX	2647	214.1

Analysis of: 31A TX HOUSTON

HAAT 438.0 m, ATV ERP 265.2 kW, direction 30.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	3783542	25008.8
not affected by terrain losses	3783542	25004.7
lost to NTSC IX	1336	20.2
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	1336	20.2
percent match ATV/NTSC	100.0	100.0

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FIGURE 2A (CONTINUED)

num atv: 6904 num ntsc: 6904 cell: 4.0358 Analysis of: 20N TX HOUSTON				num atv: 6904 num ntsc: 6904 cell: 4.0358 Analysis of: 20N TX HOUSTON			
	POPULATION	AREA (sq km)			POPULATION	AREA (sq km)	
within Noise Limited Contour	3787966	27903.7		within Noise Limited Contour	3787966	27903.7	
not affected by terrain losses	3787631	27867.4		not affected by terrain losses	3787631	27867.4	
lost to NTSC IX	73	4.0		lost to NTSC IX	73	4.0	
lost to additional IX by ATV	3603	201.8		lost to additional IX by ATV	3603	201.8	
lost to all IX	3676	205.8		lost to all IX	3676	205.8	
Analysis of: 19A TX HOUSTON HAAT 552.0 m, ATV ERP 228.8 kW, direction 30.0 degrees T				Analysis of: 19A TX HOUSTON HAAT 552.0 m, ATV ERP 228.8 kW, direction 30.0 degrees T			
	POPULATION	AREA (sq km)			POPULATION	AREA (sq km)	
within Noise Limited Contour	3787966	27903.7		within Noise Limited Contour	3787966	27903.7	
not affected by terrain losses	3787774	27891.6		not affected by terrain losses	3787774	27891.6	
lost to NTSC IX	0	0.0		lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0		lost to additional IX by ATV	0	0.0	
lost to ATV IX only	0	0.0		lost to ATV IX only	0	0.0	
lost to all IX	0	0.0		lost to all IX	0	0.0	
percent match ATV/NTSC	100.0	100.0		percent match ATV/NTSC	100.0	100.0	
num atv: 4958 num ntsc: 4958 cell: 4.0117 Analysis of: 15N LA LAFAYETTE				num atv: 4958 num ntsc: 4958 cell: 4.0117 Analysis of: 15N LA LAFAYETTE			
	POPULATION	AREA (sq km)			POPULATION	AREA (sq km)	
within Noise Limited Contour	585965	19890.0		within Noise Limited Contour	585965	19890.0	
not affected by terrain losses	585965	19890.0		not affected by terrain losses	585965	19890.0	
lost to NTSC IX	0	0.0		lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0		lost to additional IX by ATV	0	0.0	
lost to all IX	0	0.0		lost to all IX	0	0.0	
Analysis of: 16A LA LAFAYETTE HAAT 360.0 m, ATV ERP 89.1 kW, direction 140.0 degrees T				Analysis of: 16A LA LAFAYETTE HAAT 360.0 m, ATV ERP 89.1 kW, direction 140.0 degrees T			
	POPULATION	AREA (sq km)			POPULATION	AREA (sq km)	
within Noise Limited Contour	585965	19890.0		within Noise Limited Contour	585965	19890.0	
not affected by terrain losses	585965	19890.0		not affected by terrain losses	585965	19890.0	
lost to NTSC IX	0	0.0		lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0		lost to additional IX by ATV	0	0.0	
lost to ATV IX only	0	0.0		lost to ATV IX only	0	0.0	
lost to all IX	0	0.0		lost to all IX	0	0.0	
percent match ATV/NTSC	100.0	100.0		percent match ATV/NTSC	100.0	100.0	
num atv: 7709 num ntsc: 7709 cell: 3.9954 Analysis of: 22N TX GALVESTON				num atv: 7709 num ntsc: 7709 cell: 3.9954 Analysis of: 22N TX GALVESTON			
	POPULATION	AREA (sq km)			POPULATION	AREA (sq km)	
within Noise Limited Contour	3696126	30800.6		within Noise Limited Contour	3696126	30800.6	
not affected by terrain losses	3696126	30800.6		not affected by terrain losses	3696126	30800.6	
lost to NTSC IX	0	0.0		lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0		lost to additional IX by ATV	0	0.0	
lost to all IX	0	0.0		lost to all IX	0	0.0	
Analysis of: 23A TX GALVESTON HAAT 566.0 m, ATV ERP 236.0 kW, direction 350.0 degrees T				Analysis of: 23A TX GALVESTON HAAT 566.0 m, ATV ERP 236.0 kW, direction 350.0 degrees T			
	POPULATION	AREA (sq km)			POPULATION	AREA (sq km)	
within Noise Limited Contour	3696126	30800.6		within Noise Limited Contour	3696126	30800.6	
not affected by terrain losses	3696126	30800.6		not affected by terrain losses	3696126	30800.6	
lost to NTSC IX	0	0.0		lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0		lost to additional IX by ATV	0	0.0	
lost to ATV IX only	0	0.0		lost to ATV IX only	0	0.0	
lost to all IX	0	0.0		lost to all IX	0	0.0	
percent match ATV/NTSC	100.0	100.0		percent match ATV/NTSC	100.0	100.0	

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FIGURE 2B **ANALYSIS OF NTSC/ATV STATIONS** **AFFECTED BY CHANNEL 25 DTV PAIRING FOR KTFH-TV**

KTFH PAIRED WITH CH. 5 (SIXTH R&O)

KTFH PAIRED WITH CH. 25 (PROP.)

ANALYSES BEFORE MOVING KTFH TO CHANNEL 25

ANALYSES AFTER MOVING KTFH TO CHANNEL 25

Analysis of: 5N LA ALEXANDRIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44403.0
not affected by terrain losses	990277	43704.3
lost to NTSC IX	16508	569.0
lost to additional IX by ATV	0	0.0
lost to all IX	16508	569.0

Analysis of: 35A LA ALEXANDRIA

HAAT 485.0 m, ATV ERP 1000.0 kW, Cap Adj 2.2 dB 90.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44483.0
not affected by terrain losses	1000586	44103.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	655	169.5
lost to ATV IX only	655	169.5
lost to all IX	655	169.5
percent match ATV/NTSC	100.0	99.9

Analysis of: 5N LA ALEXANDRIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44483.0
not affected by terrain losses	990277	43704.3
lost to NTSC IX	16508	569.0
lost to additional IX by ATV	0	0.0
lost to all IX	16508	569.0

Analysis of: 35A LA ALEXANDRIA

HAAT 485.0 m, ATV ERP 1000.0 kW, Cap Adj 2.2 dB 90.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	1004324	44483.0
not affected by terrain losses	1000586	44103.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	655	169.5
lost to ATV IX only	655	169.5
lost to all IX	655	169.5
percent match ATV/NTSC	100.0	99.9

Analysis of: 6N TX BEAUMONT

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	703695	33100.3
lost to NTSC IX	63684	4714.3
lost to additional IX by ATV	0	0.0
lost to all IX	63684	4714.3

Analysis of: 21A TX BEAUMONT

HAAT 293.0 m, ATV ERP 1000.0 kW, Cap Adj 1.6 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	704249	33104.7
lost to NTSC IX	121	64.3
lost to additional IX by ATV	0	0.0
lost to ATV IX only	7	8.0
lost to all IX	121	64.3
percent match ATV/NTSC	100.0	100.0

Analysis of: 6N TX BEAUMONT

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	703695	33100.3
lost to NTSC IX	63684	4714.3
lost to additional IX by ATV	0	0.0
lost to all IX	63684	4714.3

Analysis of: 21A TX BEAUMONT

HAAT 293.0 m, ATV ERP 1000.0 kW, Cap Adj 1.6 dB

	POPULATION	AREA (sq km)
within Noise Limited Contour	704455	33285.1
not affected by terrain losses	704249	33104.7
lost to NTSC IX	121	64.3
lost to additional IX by ATV	0	0.0
lost to ATV IX only	7	8.0
lost to all IX	121	64.3
percent match ATV/NTSC	100.0	100.0

Analysis of: 6N TX FORT WORTH

	POPULATION	AREA (sq km)
within Noise Limited Contour	4418651	46297.3
not affected by terrain losses	4400524	45059.5
lost to NTSC IX	173366	5449.6
lost to additional IX by ATV	0	0.0
lost to all IX	173366	5449.6

Analysis of: 41A TX FORT WORTH

HAAT 514.0 m, ATV ERP 1000.0 kW, Cap Adj 3.0 dB 315.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	4418651	46297.3
not affected by terrain losses	4411022	45537.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 6N TX FORT WORTH

	POPULATION	AREA (sq km)
within Noise Limited Contour	4418651	46297.3
not affected by terrain losses	4400524	45059.5
lost to NTSC IX	173366	5449.6
lost to additional IX by ATV	0	0.0
lost to all IX	173366	5449.6

Analysis of: 41A TX FORT WORTH

HAAT 514.0 m, ATV ERP 1000.0 kW, Cap Adj 3.0 dB 315.0 deg T

	POPULATION	AREA (sq km)
within Noise Limited Contour	4418651	46297.3
not affected by terrain losses	4411022	45537.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

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FIGURE 2B (CONTINUED)

Analysis of: 5N TX SAN ANTONIO

	POPULATION	AREA (sq km)
within Noise Limited Contour	1663667	40635.9
not affected by terrain losses	1638940	39003.8
lost to NTSC IX	51375	2892.3
lost to additional IX by ATV	36	4.0
lost to all IX	51411	2896.3

Analysis of: 55A TX SAN ANTONIO

	POPULATION	AREA (sq km)
HAAT 424.0 m, ATV ERP 1000.0 kW, Cap Adj 3.3 dB		
within Noise Limited Contour	1663667	40635.9
not affected by terrain losses	1646977	39239.8
lost to NTSC IX	39595	452.0
lost to additional IX by ATV	13	8.0
lost to ATV IX only	37917	412.0
lost to all IX	39608	460.0
percent match ATV/NTSC	99.3	99.4

Analysis of: 5N TX SAN ANTONIO

	POPULATION	AREA (sq km)
within Noise Limited Contour	1663667	40635.9
not affected by terrain losses	1638940	39003.8
lost to NTSC IX	51375	2892.3
lost to additional IX by ATV	0	0.0
lost to all IX	51375	2892.3

Analysis of: 55A TX SAN ANTONIO

	POPULATION	AREA (sq km)
HAAT 424.0 m, ATV ERP 1000.0 kW, Cap Adj 3.3 dB		
within Noise Limited Contour	1663667	40635.9
not affected by terrain losses	1646977	39239.8
lost to NTSC IX	39595	452.0
lost to additional IX by ATV	13	8.0
lost to ATV IX only	37917	412.0
lost to all IX	39608	460.0
percent match ATV/NTSC	99.3	99.4

Analysis of: 25N LA ALEXANDRIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	317703	19607.1
not affected by terrain losses	317534	19575.0
lost to NTSC IX	200	48.2
lost to additional IX by ATV	0	0.0
lost to all IX	200	48.2

Analysis of: 26A LA ALEXANDRIA

	POPULATION	AREA (sq km)
HAAT 415.0 m, ATV ERP 64.6 kW, direction 190.0 degrees T		
within Noise Limited Contour	317703	19607.1
not affected by terrain losses	317695	19603.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	4.0
lost to ATV IX only	0	4.0
lost to all IX	0	4.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 25N LA ALEXANDRIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	317703	19607.1
not affected by terrain losses	317534	19575.0
lost to NTSC IX	200	48.2
lost to additional IX by ATV	0	0.0
lost to all IX	200	48.2

Analysis of: 26A LA ALEXANDRIA

	POPULATION	AREA (sq km)
HAAT 415.0 m, ATV ERP 64.6 kW, direction 190.0 degrees T		
within Noise Limited Contour	317703	19607.1
not affected by terrain losses	317695	19603.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	4.0
lost to ATV IX only	0	4.0
lost to all IX	0	4.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 22N TX GALVESTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3696126	30000.6
not affected by terrain losses	3696126	30000.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 23A TX GALVESTON

	POPULATION	AREA (sq km)
HAAT 566.0 m, ATV ERP 236.0 kW, direction 350.0 degrees T		
within Noise Limited Contour	3696126	30000.6
not affected by terrain losses	3696126	30000.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

Analysis of: 22N TX GALVESTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3696126	30000.6
not affected by terrain losses	3696126	30000.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of: 23A TX GALVESTON

	POPULATION	AREA (sq km)
HAAT 566.0 m, ATV ERP 236.0 kW, direction 350.0 degrees T		
within Noise Limited Contour	3696126	30000.6
not affected by terrain losses	3696126	30000.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

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FIGURE 2B (CONTINUED)

Analysis of: 26N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3825068	31379.9
not affected by terrain losses	3824678	31339.5
lost to NTSC IX	8750	238.2
lost to additional IX by ATV	2345	141.3
lost to all IX	11095	379.6

Analysis of: 27A TX HOUSTON

HAAT	594.0 m, ATV ERP	228.8 kW, direction	40.0 degrees T
	POPULATION	AREA (sq km)	
within Noise Limited Contour	3825068	31379.9	
not affected by terrain losses	3824848	31367.7	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0	
lost to ATV IX only	0	0.0	
lost to all IX	0	0.0	
percent match ATV/NTSC	100.0	100.0	

Analysis of: 26N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3825068	31379.9
not affected by terrain losses	3824678	31339.5
lost to NTSC IX	8750	238.2
lost to additional IX by ATV	2345	141.3
lost to all IX	11095	379.6

Analysis of: 27A TX HOUSTON

HAAT	594.0 m, ATV ERP	228.0 kW, direction	40.0 degrees T
	POPULATION	AREA (sq km)	
within Noise Limited Contour	3825068	31379.9	
not affected by terrain losses	3824848	31367.7	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0	
lost to ATV IX only	0	0.0	
lost to all IX	0	0.0	
percent match ATV/NTSC	100.0	100.0	

Analysis of: 39N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3779622	27743.5
not affected by terrain losses	3778992	27699.1
lost to NTSC IX	2596	169.5
lost to additional IX by ATV	394	4.0
lost to all IX	2990	173.6

Analysis of: 38A TX HOUSTON

HAAT	594.0 m, ATV ERP	199.5 kW, direction	70.0 degrees T
	POPULATION	AREA (sq km)	
within Noise Limited Contour	3779622	27743.5	
not affected by terrain losses	3779574	27731.4	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	186	8.1	
lost to ATV IX only	186	8.1	
lost to all IX	186	8.1	
percent match ATV/NTSC	100.0	100.0	

Analysis of: 39N TX HOUSTON

	POPULATION	AREA (sq km)
within Noise Limited Contour	3779622	27743.5
not affected by terrain losses	3778992	27699.1
lost to NTSC IX	2596	169.5
lost to additional IX by ATV	394	4.0
lost to all IX	2990	173.6

Analysis of: 38A TX HOUSTON

HAAT	594.0 m, ATV ERP	199.5 kW, direction	70.0 degrees T
	POPULATION	AREA (sq km)	
within Noise Limited Contour	3779622	27743.5	
not affected by terrain losses	3779574	27731.4	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	186	8.1	
lost to ATV IX only	186	8.1	
lost to all IX	186	8.1	
percent match ATV/NTSC	100.0	100.0	

Analysis of: 35N TX VICTORIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	164600	16144.5
not affected by terrain losses	164600	16144.5
lost to NTSC IX	254	60.3
lost to additional IX by ATV	0	0.0
lost to all IX	254	60.3

Analysis of: 15A TX VICTORIA

HAAT	311.0 m, ATV ERP	50.0 kW, direction	270.0 degrees T
	POPULATION	AREA (sq km)	
within Noise Limited Contour	164600	16144.5	
not affected by terrain losses	164600	16144.5	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0	
lost to ATV IX only	0	0.0	
lost to all IX	0	0.0	
percent match ATV/NTSC	100.0	100.0	

Analysis of: 35N TX VICTORIA

	POPULATION	AREA (sq km)
within Noise Limited Contour	164600	16144.5
not affected by terrain losses	164600	16144.5
lost to NTSC IX	254	60.3
lost to additional IX by ATV	0	0.0
lost to all IX	254	60.3

Analysis of: 15A TX VICTORIA

HAAT	311.0 m, ATV ERP	50.0 kW, direction	270.0 degrees T
	POPULATION	AREA (sq km)	
within Noise Limited Contour	164600	16144.5	
not affected by terrain losses	164600	16144.5	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	0	0.0	
lost to ATV IX only	0	0.0	
lost to all IX	0	0.0	
percent match ATV/NTSC	100.0	100.0	

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FIGURE 2B (CONTINUED)

Analysis of: 25N TX WACO

	POPULATION	AREA (sq km)
within Noise Limited Contour	718975	29295.0
not affected by terrain losses	715405	28896.8
lost to NTSC IX	120776	2634.3
lost to additional IX by ATV	0	0.0
lost to all IX	120776	2634.3

Analysis of: 26A TX WACO
HAAT 558.0 m, ATV ERP 224.6 kW, direction 200.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	718975	29295.0
not affected by terrain losses	718564	29154.2
lost to NTSC IX	114	52.3
lost to additional IX by ATV	38	28.2
lost to ATV IX only	84	44.2
lost to all IX	152	80.4
percent match ATV/NTSC	100.0	100.0

Analysis of: 25N TX WACO

	POPULATION	AREA (sq km)
within Noise Limited Contour	718975	29295.0
not affected by terrain losses	715405	28896.8
lost to NTSC IX	120776	2634.3
lost to additional IX by ATV	0	0.0
lost to all IX	120776	2634.3

Analysis of: 26A TX WACO
HAAT 558.0 m, ATV ERP 224.6 kW, direction 200.0 degrees T

	POPULATION	AREA (sq km)
within Noise Limited Contour	718975	29295.0
not affected by terrain losses	718564	29154.2
lost to NTSC IX	114	52.3
lost to additional IX by ATV	38	28.2
lost to ATV IX only	84	44.2
lost to all IX	152	80.4
percent match ATV/NTSC	100.0	100.0

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